

NO. PD-0578-16

Ex Parte

ADAM WAYNE INGRAM,

Appellant.

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IN THE COURT
COURT OF CRIMINAL APPEALS
7/7/2017
OF CRIMINAL APPEALS, CLERK
OF TEXAS

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S MOTION FOR REHEARING**

TO THE HONORABLE COURT OF CRIMINAL APPEALS OF TEXAS:

COMES NOW ADAM WAYNE INGRAM, Appellant in the above styled and numbered cause, by and through Undersigned Counsel, and submits this Motion for Extension of Time pursuant to Rules 79.6 and 10.5 of the Texas Rules of Appellate Procedure. In support of same, Appellant would respectfully show this Honorable Court as follows:

1. The judgement in this case was rendered on June 28, 2017 and, unless the time is extended, Appellant's motion for rehearing would be due on or before July 13, 2017.
2. Counsel for Appellant respectfully requests a 14-day extension of time within which to file a motion for rehearing.
3. Defense Counsel first viewed the Orders in this matter on June 29, 2017, and was unavailable during the July 4th holiday weekend from

Friday, June 30 to July 04, 2017. Defense Counsel is scheduled for a discovery review meeting in Laredo, Texas, with the United States Attorney's Office on July 07, 2017, in *United States v. Stephen Ward Pack*, Cause No. 5:17-CR-00458, currently pending in the United States District Court for the Southern District of Texas, Laredo Division.

4. Additionally, Defense Counsel will be out of town for a Texas Criminal Defense Lawyers Association Seminar from July 11, 2017, through July 17, 2017.
5. An extension of the deadline is necessary to allow Defense Counsel to adequately prepare the motion for rehearing.
6. No prior extension has been filed for rehearing in this matter.
7. Defense Counsel has conferred with Counsel for the State who is unopposed to this Motion.
8. This request is not made for the purposes of delay, but that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Appellant prays this Honorable Court to extend the deadline to file Appellant's Motion for Rehearing for an additional 14 days.

Respectfully submitted,

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BY: /s/ Donald H. Flanary, III.
Donald H. Flanary, III.
State Bar No. 24045877
ATTORNEY FOR APPELLANT,
Adam Wayne Ingram.

CERTIFICATE OF SERVICE

This is to certify that on July 6, 2017, a true and correct copy of the above and foregoing document was served on the District Attorney's Office, Bexar County, Texas, via email.

/s/ Donald H. Flanary, III.
Donald H. Flanary, III.